

Serial No. 09/822,855  
Art Unit 2173

PU040192

**Remarks/Arguments**

Claims 1-14 presently pending in this application now stand rejected in view of the Official action of 8 September 2005. Applicants have amended claims 1, 11, and 13 to better distinguish applicants' invention from the art of record. Ample antecedent basis exists in the specification for the claim amendments.

Before proceeding to address the examiner's rejections, applicants will briefly summarize their invention to assist the examiner in better appreciating the differences between applicants' invention and the art of record. As recited in amended claim 1, applicants provide a method for producing show in a production environment having at least one processing unit in communications with a plurality of production devices, including at least a camera and a robotic pan/tilt head. The method commences upon the receipt of a show rundown manually assembled by a producer to comprise a plurality of story files. Typically, the story files are selected by a producer from news files originating either from local reporters or automated news sources. The show rundown undergoes conversion into broadcast instructions that, when executed, in a step-by-step manner responsive to a manual trigger from the producer in an event-driven manner, enable the transmission of commands to control a plurality of production devices, including the camera and pan/tilt head to thereby produce the show live in real time for at least one of transmission and recording.

**35 U.S.C. 102(e) Rejection of Claims 1, 11, and 13**

Claims 1, 2, 11, and 13 stand rejected under 35 U.S.C. 102(b) as anticipated by U.S. Patent 5,795,228, issued August 18, 1998, in the name of Douglas Trumbull et al. Applicants respectfully traverse the rejection.

The Trumbull patent concerns a computer-based system that interacts with a user to present audio-visual and/or computer-generated images responsive to user-received input signals. An interface receives signals from the user that specifying selected content, i.e., selected audio, video and/or computer images. For example, the user enters input signals to interact with ongoing entertainment selected by an operator (producer). One or more of the input signals generated by the user allow a database to identify the user and to retrieve an associated profile. In accordance with the profile, an activity server generates a set of show

Serial No. 09/822,855  
Art Unit 2173

PU040192

control signals that designate audio, video and or computer-generated graphical images that reflect the user's desired interaction with the presented entertainment.

As amended, claims 1, 11 and 13 now include the feature of converting the show rundown into broadcast instructions that are executed in a step-by-step manner responsive to a manual trigger from the producer in an event-driven manner to transmit commands to at least the camera and robotic pan/tilt head to produce the show live in real time for at least one of transmission and recording. The Trumbull et al. patent does not teach or disclose this feature.

To the extent that Trumbull et al. converts a show rundown into broadcast instructions, such instructions do not undergo execution in a step-by-step manner in response to a manual trigger from the producer. Further, the broadcast instructions of Trumbull et al. do not control a camera and pan/tilt head. In his rejection of claims 1, 11 and 13, the examiner relies on the disclosure in the Trumbull et al. patent at Col. 13, lines. 19-21 as teaching applicants' step of converting the show rundown into broadcast instructions for controlling a plurality of production devices. A careful examination of this section of the Trumbull et al. patent reveals no disclosure or suggestion of step-by step execution of such instructions responsive to a manually trigger by a producer.

The examiner's suggestion that the Trumbull et al. patent suggests transmitting instructions to control the camera (58) lacks foundation as well. Referring to FIG. 4, the video camera (58) of Trumbull et al. provides an output signal to the video playback and mixing station (48). Nothing in FIG. 4 or in the specification of Trumbull et al. indicates any control of that camera. Indeed, the absence of any control line entering the camera (58) in FIG. 4 of Trumbull evidences a lack of any desire to control the camera via a broadcast instruction.

Given that the Trumbull et al. patent fails to teach the applicants' feature of step-by step execution of such instructions responsive to a manually trigger by a producer to control a camera and pan/tilt unit, claims 1, 11 and 13 patentably distinguish over this patent. Applicants request withdrawal of the 35 U.S.C. 102(b) of the rejection of claims 1, 11, and 13.

Claim 2 depends from claim 1 and incorporates by reference all of the features of its parent claim. Therefore, claim 2 patentably distinguishes over the Trumbull et al. patent for the same reasons as claim 1. Withdrawal of the 35 U.S.C. 102(b) rejection of claim 2 is requested.

Serial No. 09/822,855  
Art Unit 2173

PU040192

**35 U.S.C. 103(a) Rejection of Claims 3-6, 8-12 and 14**

Claims 3-6, 8, 12 and 14 stand rejected under 35 U.S.C. 103(a) as obvious over the Trumbull et al. patent, in view of U.S. Patent 6,437,802, issued August 20, 2002 from an application filed July 14, 1999, in the name of Kevin Kenny. Applicants respectfully traverse this rejection.

Applicants have discussed the Trumbull et al. patent will not repeat that discussion here for the sake of brevity. For purposes of the instant rejection, applicants reiterate that Trumbull et al. does not teach or suggest the feature of step-by step execution of broadcast instructions responsive to a manually trigger by a producer to control a camera and pan/tilt unit

The Kenny patent concerns a technique for throttling commands in a broadcast automation system by interleaving play list loads and edit commands. In this way, devices within the system can receive an incomplete schedule for immediate execution. As later events undergo processing, the devices can execute such events as they become processed. The Kenny patent remains silent regarding receipt of the show rundown files and conversion to broadcast instructions, let alone step-by step execution of such broadcast instructions responsive to a manually trigger by a producer to control a camera and pan/tilt unit.

Claims 3-6 and 8 depend from claim 1, whereas claims 12 and 14 depend from claims 11 and 13, respectively. Thus claims 3-6 and 8, claim 11 and claim 12 incorporate by reference all of the features of claims 1, 11, and 13, respectively. Neither the Trumbull et al. patent nor the Kenny patent, nor the combination, teaches applicants' feature of step-by step execution of broadcast instructions responsive to a manually trigger by a producer to control a camera and pan/tilt unit. Therefore claims 3-6 and 8, claim 11 and claim 12 patentably distinguish over the art of record for the same reasons as claims 1, 11, and 12, respectively.

**35 U.S.C. 103(a) Rejection of Claims 7 and 9**

Claims 7 and 9 stand Finally Rejected under 35 U.S.C. 103(a) as obvious over Trumbull et al, in view of Kenny, further in view of U.S. Patent 6,441,832, issued August 27, 2002, from an application filed November 26, 1997, in the name of Akihiko Tao et al. Applicants respectfully traverse the rejection.

Serial No. 09/822,855  
Art Unit 2173

PU040192

Applicants have discussed the Trumbull et al. and Kenny patents, and will not repeat that discussion here. For purpose of the present rejection, applicants reiterate that neither of the Trumbull et al. nor Kenny patents, nor their combination, teach or suggest the feature of step-by step execution of broadcast instructions responsive to a manually trigger by a producer to control a camera and pan/tilt unit.

The Tao et al. patent teaches a hierarchical processing video and audio processing apparatus for editing a play list. A display device displays the first and second play list hierarchies to allow interaction between the play lists. Like Trumbull et al. and Kenny, Tao et al. does not teach step-by step execution of broadcast instructions responsive to a manually trigger by a producer to control a camera and pan/tilt unit.

Applicants' claims 7 and 9 ultimately depend 1 and each incorporates by reference all of the features of its parent claim. Therefore claims 7 and 9 patentably distinguish over the art of record for the same reasons as claim 1. Applicants request withdrawal of the 35 U.S.C. 103 rejection of claims 7 and 9.

### 35 U.S.C. 103(a) Rejection of Claim 10

Claim 10 stands rejected under 35 U.S.C. 103(a) as obvious over the Trumbull et al. patent, in view of the Tao et al. and Kenny patents, further in view of U.S. Patent 5,450,140, issued September 12, 1995, in the name of Kinya Washino. Applicants respectfully traverse this rejection.

Applicants have discussed the Trumbull et al. Kenny and Tao et al. patents and will not repeat that discussion here. For purposes of this rejection, applicants reiterate that none of the Trumbull et al. Kenny and Tao et al. patents teach step-by step execution of broadcast instructions responsive to a manually trigger by a producer to control a camera and pan/tilt unit.

The Washino patent likewise contains no disclosure of applicants feature of converting a show into broadcast instructions for step-by step execution responsive to a manually trigger by a producer to control a camera and pan/tilt unit. While Washino does disclose a camera and pan/tilt unit, the patent contains no disclosure regarding the feature of populating broadcast instructions into a time sheet as recited in claim 10. The disclosure cited by the examiner at Col. 2, lines 10-15 of Washino describes the use of icons on the same screen as

Serial No. 09/822,855  
Art Unit 2173

PU040192

the image, not on a screen showing the icon in time-relation to other commands, as in the case when the icons populate a time instruction sheet. Therefore, claim 10 patentably distinguishes over the combination of the Trumbull et al., Tao et al., Kenny, and Washino patents. Applicants respectfully request withdrawal of the 35 U.S.C. 103(a) rejection of claim 10.

### Conclusion

In view of the foregoing remarks, applicants respectfully solicit entry of this amendment and reconsideration of the rejection. If, however, the Examiner is believes that such action cannot be taken, the examiner is invited to contact the applicant's attorney at (609) 734-6820 to arrange for a mutually convenient date and time for a telephonic interview.

No fee is believed due. However, if a fee is due, please charge the additional fee to Deposit Account 07-0832.

Respectfully submitted,  
Alex Holtz et al.

By: Robert B. Levy  
Reg. No. 28,234  
Phone (609) 734-6820

Patent Operations  
Thomson Licensing Inc.  
2 Independence Boulevard - Suite 2  
Princeton, New Jersey 08540  
October 21, 2005

PU040192

**CERTIFICATE OF TRANSMISSION**

I hereby certify that this correspondence is being facsimile transmitted to the USPTO to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date shown below:

October 24, 2005  
Date

Linda Tindall  
Linda Tindall